Staying Up-to-Date on New Developments in Family Law Litigation

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Introduction

Our societal values are ever changing, and our laws reflect these changes, as do two recent Supreme Court cases. In one, the Supreme Court has decided that Americans are entitled to affordable health care, and in the second, the court addresses same-sex marriage. I leave affordable health care for discussion on another day and will discuss same-sex marriage and its impact on Illinois.

Same-Sex Marriage Law in Illinois and the Overhaul of the IMDMA

With the Supreme Court's decision in *Obergefell, et al. vs. Hodges, Director, Ohio Department of Health, et al.* 576 U. S. ____ (2015), the court stated:

> No union is more profound than marriage, for it embodies the highest ideals of love, fidelity, devotion, sacrifice, and family. In forming a marital union, two people become something greater than once they were. As some of the petitioners in these cases demonstrate, marriage embodies a love that may endure even past death. It would misunderstand these men and women to say they disrespect the idea of marriage. Their plea is that they do respect it, respect it so deeply that they seek to find its fulfillment for themselves. Their hope is not to be condemned to live in loneliness, excluded from one of civilization's oldest institutions. They ask for equal dignity in the eyes of the law. The Constitution grants them that right.

With these words, the Court legalized same-sex marriage throughout the United States.

Recognizing our societal change in values, the Court said:

> From their beginning to their most recent page, the annals of human history reveal the transcendent importance of marriage. The lifelong union of a man and a woman always has promised nobility and dignity to all persons, without regard to their station in life. Marriage is sacred to those

> who live by their religions and offers unique fulfillment to those who find meaning in the secular realm. Its dynamic allows two people to find a life that could not be found alone, for a marriage becomes greater than just the two persons. Rising from the most basic human needs, marriage is essential to our most profound hopes and aspirations.

Illinois has been on the progressive side for quite some time. Same-sex marriage has been legally recognized in Illinois since a law was signed by Governor Pat Quinn on November 20, 2013, that took effect on June 1, 2014.

As early as 2011, Illinois established civil unions when Governor Quinn signed legislation on January 31, 2011. That law allowed both same-sex and opposite-sex couples to form civil unions and provided state recognition of substantially similar legal relationships, including same-sex marriages and civil unions, entered into in other jurisdictions.

Illinois continued its progressive moves when legislation was introduced in successive sessions of the General Assembly from 2007 to 2013. It finally passed the Senate in February 2013, but was delayed in the House. It was finally passed in an amended version by a narrow margin. The Senate quickly approved the amended bill, and Governor Quinn signed it into law on November 20. The law went into effect statewide on June 1, 2014, with same-sex couples able to apply for marriage licenses and then marry after the mandatory one-day waiting period.

On February 21, 2014, a US district court judge ruled that same-sex couples in Cook County could marry immediately and need not wait for the law to take effect on June 1. Before the enactment of the law on February 26, 2014, a same-sex couple in Illinois had very limited options in terms of the relief they could seek if their relationship dissolved. For instance, I recently met with a client who had been in a ten-year same-sex relationship. That relationship has now dissolved, and unfortunately, the client has virtually no resources because the couple never memorialized any type of agreement, and they did not get married under the new Same-Sex Marriage Act. With the passing of the new law, Illinois family law practitioners and judges are now applying equitable principles to this new concept of marriage.

New Illinois Marriage and Dissolution of Marriage Act 2015

There is a whole body of law now pending that is a major overhaul of the Illinois Marriage and Dissolution of Marriage Act of 1983 (IMDMA). (*See* Appendix H.) It has been more than four years in development and was finally passed by the Illinois General Assembly in May 2015. The bill is designated as SB 57. It is worth reading. The bill in essence will make major changes in how Illinois family law practitioners handle family law cases. For instance, the new law will eliminate grounds for divorce, shift away from the designation of custody and toward the allocation of parenting responsibilities, and cause other important changes that will be challenging for years to come.

Andre Katz, a principal with Katz & Stefani and a member of the Illinois Family Law Study Committee appointed to work on amending the former law, said, "The bill redefines the term irretrievable breakdown." When the parties to a divorce live separate and apart for six months, there will be a presumption that the breakdown is irretrievable. Previously, the parties must have lived separate and apart for two years to proceed under no-fault grounds. However, that period could be waived if the parties signed an affidavit saying that they were separated for six months and that irreconcilable differences had arisen. Under the new act, this requirement is eliminated.

As stated earlier, our societal values are evolving. Many parents choose not to marry but have children together. And those who are married and have children raise their children differently than our parents did. In recognizing these changes, the new law would recognize that both parents must have the ability to have equal relationships with their children. For instance, under the present law, a residential parent can move with the child anywhere in the state. Under the new proposed law, there would be a limitation of twenty-five miles without seeking leave of court. The law thus recognizes the interests of both parents to have access to their children and be involved in their lives.

The new proposed act has been sent to the governor for signature, and it is expected to become the law of the land shortly. Attorneys should review the act and become familiar with the gravity of the changes.

New Spousal Rules for Determining Maintenance

In 2015, the present Marriage Act was amended to include a new guideline for judges to determine the amount and duration of maintenance for couples whose gross income is less than $250,000. In effect, once the court determines that maintenance is appropriate, it follows guidelines that have been set for the court to use in determining the award. Prior to the law, judges had discretion to calculate maintenance without using a statutory formula. I need not go into the entire formula for you; you can do that yourself by reading amended Section 504 of the act. The whole reason for this change in the law was based on the increasing inconsistency with which judges were awarding maintenance. It was virtually unpredictable for attorneys and was a hindrance in settlement negotiations. The inevitable result was excessive litigation and increasing costs of legal fees. The new change sets forth the parameters for determining both the amount and the duration of maintenance awards.

Of course, with any new change, there are questions about its application and retroactive implications. And still, courts have discretion on parties' incomes above $250,000. It has been my experience that judges are very mixed in applying this new change retroactively to cases pending prior to 2015. The new act is silent about retroactive application. It is believed that the default of Section 4 of the statute on statutes governs. Accordingly, the new act may be applied retroactively, but substantive changes cannot.

The new maintenance law is a work in progress. Much depends on whether the income of one or both spouses is more than $250,000 when it comes to what the court should do in terms of calculating the appropriate maintenance. I think the new maintenance law is a good tool for the courts to use. While the courts have the ability to deviate from this legislation, they have to justify that deviation with some kind of finding and let the parties know why they have deviated from the law.

The Inequity of Equitable Distribution

The division of property during a divorce is supposed to be based on equitable principles; however, this is not always the case. In a 2014 case before the Illinois Appellate Court, the court affirmed the lower court

decision by refusing to offset the value of the husband's state pension in lieu of the Social Security benefits received by the wife.[1] The court wimped out and is leaving this decision open for the Illinois Supreme Court, as it has stated in its opinion.

In this case, the husband was a state employee who had a pension and was not subject to Social Security deductions. His sole retirement would come from this pension, and he was precluded from receiving Social Security. The court found justification to hold that the wife's Social Security could not be used as an offset against the value of husband's pension.

This logic is fundamentally flawed. The law presently states that Social Security benefits cannot be divided or used as a basis for an offset during state dissolution proceedings.[2] In my opinion, this creates an inequality in dividing the marital estate. Practitioners should be aware of this during negotiations. This situation is ripe for the Supreme Court.

Attorney Fees and Leveling the Playing Field

The "leveling of the playing field" legislation has been in force for many years now. It is a common practice for the courts to give a disadvantaged spouse the ability to have the same type of legal representation as the financially advantaged spouse. For instance, a wife who is not employed is entitled to the same type of representation her high-priced executive husband is able to obtain. In my opinion, the leveling of the playing field legislation has had an extremely positive effect in terms of allowing both parties to litigate their cases appropriately and with the best legal talent they can possibly obtain.

Impacts of the Economy on the Practice of Illinois Family Law

Over the last six or seven years, the economy certainly has had a major impact on the practice of family law in Illinois, in that the parties typically do not have the same financial ability that parties used to have to finance a proper piece of litigation. Simply put, they often do not have the money to

[1] *In re the Marriage of Shelley Mueller and Christopher Mueller,* 2014 IL App (4th).
[2] *Crook,* 211 Ill. 2d at 449.

pay for legal services. People want a Perry Mason defense at a public defender price.

Many people who sought a divorce in the last seven years were adversely affected by the economy. As a result, they were unable to achieve the same kind of results that they would have achieved had the economy been stronger. This is particularly true in terms of the division of assets, including real estate, whose value has dropped drastically over the past few years. A key question then arises: How does a court equitably divide negatively valued assets? The process involves allocating debt to a husband and wife, as opposed to allocating assets.

Obtaining a divorce has been particularly difficult for the middle class; quite often, they simply do not have enough assets to handle a divorce case properly. This situation has put more pressure on attorneys, who often ask for retainer fees in divorce cases of $3,000 to $10,000—and because of the client's expectations about litigation, that amount tends to dry up within a short time. Just going through the normal process of discovery can run into the tens of thousands of dollars.

In many cases, attorneys are forced to either work free or to withdraw from representation. In fact, the amount of bad debt that divorce attorneys have had to write off has increased by about 100 percent in the past decade. Clients still want great representation in divorce cases—they want depositions to be taken; they want subpoenas sent out; and they want to find out every little piece of information that can be found out about their spouse, including the existence of any hidden assets—but the cost of that level of representation and litigation is so exorbitant that they cannot afford to pay for it. Ultimately, they use up their retainers; they do not have enough money to hire another attorney; they are forced to represent themselves and obtain poor results. There is no question that the economy has had the most significant impact on the practice of family law.

Impacts on Future Developments in Illinois Family Law

Several key decisions over the past few years will influence future developments in the practice of Illinois family law. The Illinois Appellate Court has recently reaffirmed a lower court decision that a Chicago cancer

survivor will get custody of three frozen embryos despite her ex-boyfriend's pleas against what he considers forced procreation. The court opined that the woman had a greater interest in the fate of the embryos than the donating man had and stated, "based on evidence in the record that the pre-embryos represent Karla's last and only opportunity to have a biological child with her own eggs."

"As an increasing number of children are born through reproductive technology—and men, women, gay and straight couples use it to create children—we'll see more and more disputes over frozen embryos," said Naomi Cahn, a professor at The George Washington University Law School and an expert in reproductive technology. "The law is catching up to what the technology can do."

Likewise, now that same-sex couples are being allowed to marry, some new issues have been created for family law practitioners, including issues pertaining to grandparents of the children of a same-sex union—i.e., if your son or daughter is deceased, do you have any custody rights as a grandparent? There have already been substantial litigation and new decisions in this area. Also, in the wake of the pending passage of the new Illinois Marriage and Dissolution of Marriage Act, attorneys are now looking at areas such as custody and visitation quite differently, and so are the courts.

Of most interest is the court's award of child support to the non-custodial parent.[3] The court upheld a lower court ruling awarding the non-custodial parent child support. Until this case, it was a rare occasion that a non-custodial parent would be awarded child support. This case is worth a careful read.

Updated Strategies for Addressing New Developments in Illinois Family Law

I believe that it is important for family law attorneys in Illinois to stay on the cutting age of technology. For example, having the ability to Google our clients, prospective clients, and other parties in a divorce case allows us to obtain a great deal of helpful information. We now have the ability to use

[3] *See* 2015 Ill. Legis. Serv. P.A. 99-90 (S.B. 57).

the Internet to discover many facts about all the parties, often through Facebook and other social media postings. The Internet also gives us the ability to find out about any hidden assets the parties might have attempted to conceal.

We are utilizing computers in family law matters more frequently than ever before. Most attorneys scan their documents for storage, thereby eliminating the storage of paper and files. Fax machines are being used less frequently in favor of e-mail transmissions. The scanning of documents has enabled us to communicate with clients more efficiently and in transmitting documents to the opposing counsel. Text messaging is becoming more frequent with clients and attorneys in getting information instantaneously. Essentially, technology has made the discovery process much easier: I can send 1,000 pages in one e-mail attachment to opposing counsel in a matter of seconds, rather than sending a bulky package of documents through the US Postal Service.

I have found that most family law attorneys are very keen on utilizing technology. For example, thanks to my Apple Watch, while in court, I can receive e-mails and text messages without looking at my phone and check my availability for future court dates. I can also use my phone to go online to my office computer and review orders of court that were previously entered. Virtually all communications with opposing counsel and even our clients are conducted electronically, and all of our documents are stored electronically—we rarely store any paper documents. Technology helps in reducing the costs of many legal services. We no longer have to store files off-site at great expense. Scanned documents are saved on servers.

Artificial intelligence is an area of computer science that deals with giving machines the ability to seem as if they have human intelligence and the power of a machine to copy intelligent human behavior. Though I do not think that artificial inelegance will be able to fully replace the value of skilled lawyers' involvement in representing clients, I do think that lawyers will use artificial intelligence to assist them.

Electronic discovery (e-discovery) is an area where lawyers are using artificial intelligence in replacing work product from lawyers and at the same time improving the experience of law practice. By the use of intelligent algorithms to find information based on concepts and key words

and the use of "predictive coding" (which is a process whereby a machine learns from watching human behavior and then applies what it learns).

Working Effectively with Court Officers and Judges

First, I have found that there is no better way in representing clients than to know the court clerks and sheriffs. Knowing the judges is sometimes secondary. You need to learn the milieu of the courtroom, and there is no better way to do that than from the court clerks. Clerks and sheriffs talk about the attorneys, and you can be assured that it gets back to the judges. Clerks seem to know who the good attorneys are and treat them with a higher level of respect. Clerks can tell who is being honest and who is unethical.

Second, know your judges. There are many social events where you are able to mingle with local judges, and there are discussion panels and continuing legal education (CLE) events where judges will appear.

I believe it is important for family law attorneys and judges to work together as extensively as possible to understand and interpret the law. Judges should let attorneys know how they feel about certain elements of the law that may come up for argument in their courtrooms and what attorneys need to do to advocate effectively for their clients. To that end, I am very involved in bar association and CLE seminars that bring judges and attorneys together. I have often invited judges to lecture in front of panels of attorneys and let them know about current trends in the law—what is happening in this area, what they think about certain issues, and what attorneys can do more effectively when they present their clients' cases.

And last, keep up-to-date on court decisions. The best source is the ILLINOIS TRIAL COURT DIVORCE DIGEST.[4] This publication comes out monthly and provides an analysis of decisions at the trial court level. It is the best source for attorneys to know what the judges are thinking.

Supporting Clients when Initiating or Responding to a Divorce Proceeding

I communicate with my family law clients in many different ways. I want to

[4] www.illinoisdivorcedigest.com.

make my clients full partners in their litigation. For example, if I am pursuing a divorce case and I am representing the husband, I will take the time to explain the relevant law and the issues to him on a regular basis. If a case comes down from the Appellate Court or the Supreme Court that may affect the client's case, I will immediately send him a copy of that decision for his review. Again, my goal is to make my clients partners in litigation so that they know what is going on and they do not have to engage in any guesswork. Every time I receive some type of communication from the other party, I scan it into my computer and send a copy to the client. If I communicate with opposing counsel, the client will get a copy of that communication, as well. My clients know exactly what I think and what is going on in their cases because I want them to feel comfortable. I do not want them to have any anxiety or fear that something is going on that they do not know about. I think it is important for attorneys to maintain a high level of communication with their clients.

At the same time, it is important to keep in mind that there are many procedural requirements in a divorce case. If, for instance, a pleading is filed by the other side and you are required to file a response, it is extremely important to work with the client in preparing a response. As noted, clients need to feel that they have some input in the litigation process. They need to understand what is going on and why and how they are responding to any particular pleading. For example, if a wife files a petition because she is seeking maintenance, then it behooves the attorney on the other side who is representing the husband to explain to the husband what the wife needs to prove to receive maintenance, why she might be entitled to maintenance, and what kind of response he should be filing to her petition for maintenance. For example, in a maintenance case, the court must first find that a party requires maintenance. Then, and only then, does the court look into the relative finances of the parties. If the attorney has explained to his client that maintenance is appropriate, then it also behooves the attorney to communicate effectively with the client to determine what that reasonable maintenance amount should be and make every effort to resolve that issue as quickly as possible. I have found that resolving issues quickly, rather than making everything a controversy, leads to more cost-effective litigation. And sometimes, there is more room to compromise.

When representing a client during a divorce proceeding, a divorce attorney is required to be on the cutting edge of many different areas of the law. In

any divorce case, there are social and human life issues, such as child support, visitation, and custody—i.e., numerous issues involving children—and attorneys have to be sensitive to these issues. Your goal should be to work with your client in an effort to move toward some type of resolution with respect to custody and visitation issues. On the other side of the spectrum, a family law attorney must also be highly skilled in dealing with financial issues, as there are often complex issues relating to the value of certain marital assets and determining how the marital estate should be equitably divided. Essentially, divorce attorneys must be extremely skilled in many areas of the law, including negotiations. If I were a client, I would look to hire an attorney who has the ability to deal with all of these different areas, depending on the needs of my case.

Strategies for Determining Asset Valuation

If a divorce case involves assets with significant valuations, family law attorneys will often employ the use of forensic experts, including accountants and actuaries, who are able to determine the values of pension and profit-sharing plans. If the marital assets include stock options, the attorney may need to hire other experts to determine the value of those stock options for equitable distribution purposes.

In a divorce case involving substantial assets where the parties have the ability to pay for experts, it is quite possible that the experts' fees could be in excess of $50,000 to $100,000. Ultimately, much depends on the complexity of the marital estate, the complexity of the assets, and the position the parties are taking regarding the division of those assets. It is important for attorneys to be able to employ experts as required and to explain to their clients the necessity of hiring those experts and the costs involved.

Obtaining the Most Equitable Maintenance/Alimony Arrangement

Every divorce case involving maintenance issues is different. Some cases involve low-income individuals, while others involve medium-income individuals and high-asset individuals. Consequently, the strategy that would be used to determine the most equitable maintenance/alimony arrangement would be different for each of those groups of clients.

For instance, it is easy to calculate the financial obligation one low-income spouse may have to the likewise economically disadvantaged spouse. I would first have to establish before the court that my client needs maintenance, what the appropriate maintenance amount should be, and whether that maintenance amount should include an element of child support. When dealing with clients at a much higher income level, I may need to consult experts who would help me in determining what the maintenance amount in a divorce case should be. I may, for example, employ a lifestyle analyst who would testify regarding the lifestyle of the parties during the course of their marriage, or an economist who could testify regarding the need for continuing support for one spouse. Again, when dealing with low-income individuals, the process of calculating maintenance is easy and straightforward, but when dealing with higher-income individuals, the process is much more complex and fact-intensive.

Key Factors to Consider in a Child Custody/Parentage Case

Child custody cases are fact-intensive, and they tend to be extremely expensive, especially if the children are under the age of twelve. If the parents are unable to resolve the issue of custody, then the court will often appoint an attorney to represent the children's interests and deal with the individual parents to see whether they can resolve their custodial issues. The court-appointed attorney will discuss the problems and issues that the parents have regarding custody and see whether they can reach a resolution. Usually, the courts have free services available to help parents mediate these issues. At the same time, it is important for attorneys to be practical and realistic with their clients and try to resolve most of these issues as quickly as possible. In my opinion, custodial issues should be resolved within the first six months of any divorce case to get this out of the way so the parties can deal with resolving the financial issues.

In some instances, a family law attorney will be dealing with a child custody case where the parents are not married. The Illinois Parentage Act deals with such custodial issues. In most of these cases, the mother is deemed the custodial parent until the court says otherwise, and whether the other party has any rights depends on the court's decision. The court will determine what rights the other biological parent has in terms of establishing custody and visitation. The only evidence that non-custodial parents can utilize in a family law case is a voluntary admission from the mother, at the time the

child is born, that the other party is the biological parent of the child—if you cannot take such an order to the court, then virtually nothing can be done without genetic testing. However, once that order is taken to court, the court can make decisions regarding child support, contributions toward education/daycare, visitation, and custodial arrangements.

In 1991, a Voluntary Acknowledgement of Paternity Amendment was added to the Illinois Parentage Act whereby parents can sign an affidavit upon the birth of their child stating that they are the biological parents, and the biological father's name is placed on the birth certificate at that time. It should be noted that the number of unmarried individuals having children has increased significantly in the last five to six years. Therefore, a growing number of custody cases are being tried in the parentage court, and more judges are required to handle these cases. Most of the individuals who are involved in parentage cases are low-income individuals who do not have the ability to hire attorneys. As a result, the courts are dealing with more *pro se* litigants in this area—i.e., individuals who are representing themselves—and that means that the litigation process tends to move a bit slower, contributing to the growing backlog in Illinois parentage cases.

The rules and practices regarding visitation in a child custody case are codified under the Parentage Act and in the Illinois Marriage and Dissolution of Marriage Act. It should be noted that the Illinois Supreme Court has taken an active interest in resolving custodial cases, in that the court in a divorce case is charged with the responsibility of making sure that there is an entry of some kind of parenting order within the first sixty to ninety days after the filing of the petition for dissolution.

Conclusion

As noted earlier, it is increasingly important for Illinois family law attorneys to stay up-to-date with respect to new technology that can help them communicate more effectively with their clients and the other parties in a divorce case. New technology will allow attorneys a greater ability to handle cases more cost effectively and efficiently and thus improve their bottom line.

As same-sex marriage is now the law of the land, I am sure that attorneys will see more clients coming to them with legal issues. There may be a slight uptick in the number of dissolution cases that are filed because of the legalization of same-sex marriage, but there will be a time lag of at least three to five years before we see any significant increase in potential business.

My advice to Illinois attorneys is to keep up-to-date. I cannot stress this more strongly. It is so easy to be caught up in the everyday practice and to neglect important changes. Keep your legal skills sharp; become more attuned to the rules of civil procedure; attend as many CLE seminars as possible; join forum groups of attorneys who talk to one another about their cases; and read all the case law that you can, including summaries of case law. Maintain contacts with other attorneys in your practice area, and go to bar meetings and legal education classes. Have a close-knit group of friends you can discuss your cases with, and make lunch meetings productive.

Key Takeaways

- Use the Internet to discover facts about your client and the opposing party, often through Facebook and other social media postings. The Internet can also help you find out about any hidden assets the parties might have.
- Read and fully understand the Illinois Marriage and Dissolution of Marriage Act and the Parentage Act, as well as any proposed legislation. Understand what is coming down the pike and begin to implement the new terminology and the proposed amendments to certain statutes dealing with custody, visitation, child support, and maintenance.
- Get to know the clerks, sheriffs, and judges you are dealing with, including their demeanor in the courtroom and their level of honesty. Fortunately, there are many social events where you are able to mingle with local judges, and there are discussion panels and CLE events where judges will appear.
- Take the time to explain the relevant law and the issues to your client on a regular basis. If a case comes down from the Appellate Court or the Supreme Court that may affect the client's case, immediately send your client a copy of that decision. Make your

client a partner in the litigation so that the client knows what is going on and does not have to engage in any guesswork.

- Employ the use of forensic experts, including accountants and actuaries, who are able to determine the values of pension and profit-sharing plans. If the marital assets include stock options, you may need to hire other experts to determine the value of those stock options for equitable distribution purposes.
- Keep up-to-date; keep your legal skills sharp; become more attuned to the rules of civil procedure; attend as many CLE seminars as possible; join forum groups of attorneys who talk to one another about their cases; and read all the case law that you can.

Barry Locke is a partner with Hughes Socol Piers Resnick Dym Ltd. He has been a litigator for more than twenty-five years with a focus on family law matters, including adoption, contested and uncontested divorce, child support modification, custody, visitation, parentage, property distribution, maintenance, estate planning and contested estates, probate, and general litigation. Mr. Locke has been recognized as a leading Chicago divorce attorney and one of the nation's Top One Percent of attorneys in the United States as determined by the National Association of Distinguished Counsel.

As a seasoned trial attorney and skillful negotiator, Mr. Locke has successfully resolved thousands of cases in Cook County, Illinois, and the collar counties and has successfully litigated cases before the Illinois Appellate Court. Mr. Locke is often appointed by the courts to represent children whose parents are disputing custody or visitation.

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